



**PROTECTING INTELLECTUAL PROPERTY
AND COMBATING PIRACY IN THE
ONLINE ADULT ENTERTAINMENT INDUSTRY**

An IFFOR Report

September 2012

CONTENTS

INTRODUCTION	1
EXECUTIVE SUMMARY	2
WHAT IS PIRACY AND HOW DOES IT WORK?	3
CURRENT LAW: ENFORCEMENT & EFFECTIVENESS	4
THE IMPACT OF PIRACY ON THE ADULT ENTERTAINMENT INDUSTRY	6
THE INDUSTRY RESPONDS	7
RECOMMENDATIONS.....	9
1) Register the copyright for your content.....	9
2) Watermark or fingerprint your content.....	9
3) Engage the services of a DMCA agent or company.	9
4) Report abuse to search engines.....	9
5) Report abuse to payment processors.....	10
6) Take legal action.....	11
APPENDIX 1: ORGANIZATIONS, LINKS & RESOURCES.....	12
<i>Anti-Piracy services</i>	12
<i>Trade Organizations & Grassroots Campaigns</i>	12
<i>Anti-Piracy Groups around the world</i>	12
<i>Reporting Abuse</i>	13
APPENDIX 2: MASTERCARD & VISA REPORTING PROCEDURES.....	15
REPORTING IP VIOLATIONS TO MASTERCARD:.....	15
REPORTING IP VIOLATIONS TO VISA:.....	15
ABOUT IFFOR.....	17
<i>IFFOR's Goals</i>	17

INTRODUCTION

As the sponsoring organization for the .xxx top-level domain, the International Foundation for Online Responsibility (IFFOR) develops policy for top-level Internet names. Since many domain name holders have been hit hard by media piracy, IFFOR has made addressing that issue a priority. In December 2011, the IFFOR Policy Council convened a Piracy Working Group to assess the problem of media piracy in the adult industry, solicit input and ideas from impacted companies, and propose effective strategies. This report is, in part, a result of those efforts.

While the constantly evolving nature of Internet technology makes the complete or permanent elimination of piracy virtually impossible, there are important steps that intellectual property owners can take to protect their rights and their revenues. It is our hope that the information and recommendations presented herein will help adult companies better understand both piracy and their own options for dealing with it. We would also note that online piracy continues to evolve at a rapid pace and so we intend to update and revise this paper to keep in step with current developments.

The compilation of this report would not have been possible without the expertise of attorney Chad Belville, and of Trieu Hoang, General Counsel at AbbyWinters and Chair of IFFOR's Piracy Working Group who spearheaded this effort.

EXECUTIVE SUMMARY

Nearly half of all adults in the United States have purchased unauthorized DVDs, copied digital media from friends or family, or downloaded it for free. Rates of piracy are even greater in emerging markets. Peer-to-peer networks, file-sharing sites, and illegally streamed content have all aggravated the problem. Pirates monetize online copyright infringement by various means. In the Megaupload case, the FBI alleged that the site's operators had cost copyright holders half a billion dollars.

In the United States, the Digital Millennium Copyright Act (DMCA) requires ISPs, hosting companies, and websites that post user-generated content to remove copyright-infringing material in response to complaints. Some, however, criticize the DMCA as ineffective or inequitable. International enforcement of laws against online copyright infringement may also be complicated and difficult, and consumer attitudes seem to reflect at least a tacit acceptance of some piracy.

Following the advent of YouTube in 2005, the adult industry quickly adopted the lower-cost hosted video model, and the increased supply of adult content and competition drove down subscription rates while sponsors' content posted by affiliates was uploaded to free tube sites. In a survey by IFFOR of adult sites, two thirds said that tubes, torrents and file-lockers have had an extremely negative impact on their businesses. The other third, which has typically embraced content partner programs, reported a positive impact. More than half of sites polled experienced peak revenue between 2006 and 2009. While it is not possible to pinpoint what degree of revenue decline is directly attributable to piracy, piracy has necessitated a shift in business models.

Entertainment companies have been fighting piracy by technical means including content identification technologies, via DMCA takedown notices, with the help of anti-piracy services, and in some cases through litigation. Some payment processors have been convinced to discontinue relationships with sites engaged in piracy. Only recently has the adult entertainment industry gained full use of some options for fighting piracy already in use by other industries.

IFFOR recommends taking several measures to combat piracy of online content:

- 1) Register the copyright for your content.*
- 2) Watermark or fingerprint your content.*
- 3) Engage the services of a DMCA agent or company.*
- 4) Report abuse to search engines.*
- 5) Report abuse to payment processors.*
- 6) Take legal action.*

WHAT IS PIRACY AND HOW DOES IT WORK?

A recent study suggests that nearly half of all adults in the United States have engaged in activities commonly included under the rubric of “piracy.” That is, they have purchased unauthorized DVDs, copied digital media such as music, TV shows and movies from friends or family, or downloaded it for free. Among Americans between the ages of 18 and 29, the rate is higher: some 70% have engaged in such activities.¹ Rates of piracy are much greater in emerging markets: an estimated 68% of software in Russia is pirated, along with 82% of music in Mexico and 90% of movies in India.²

If you are an owner of intellectual property whose copyrights are being infringed upon, the equation boils down to this: the same product you are trying to sell legally is being given away or sold by pirates who neither seek your permission nor provide you with compensation. Online, this is accomplished in a variety of ways:

Peer-to-peer (P2P) networks and file hosting/sharing sites often utilize BitTorrent – a popular file sharing protocol for transmitting large media files – to enable users to download unlicensed copyrighted material. File-sharing “lockers” host user-uploaded content and are even harder to monitor than BitTorrent sites. Other sites feature illegally streamed content, effectively acting as bootleg versions of legal streaming sites like Netflix and Hulu. (XBIZ Research. “The 2012 XBIZ Research Report.” Spring 2012)

While plenty of copyright-infringing activity involves file-sharing among friends, within online communities, or even by those who consider circumventing commerce to be a matter of principle, the most popular and visible pirate outlets are in business to make money. Pirates seeking profit monetize online copyright infringement by charging membership fees (for access, or for faster downloads) or by selling advertising. File locker sites incentivize users to upload content by paying them as affiliates on a per download basis. Those users conduct marketing via forum posts featuring links to their uploaded files. In the recent and well-publicized Megaupload case, the FBI alleged that the site’s operators had illegally earned more than \$175 million this way – and that their conduct had cost copyright holders half a billion dollars.³

¹ Karganis, Joe. “Copyright Infringement and Enforcement in the US.” The American Assembly, November 2011.

² Joe Karganis, ed. “Media Piracy in Emerging Economies.” Social Science Research Council, March 2011.

³ United States Department of Justice. (January 19, 2012). Justice Department Charges Leaders of Megaupload with Widespread Online Copyright Infringement [Press release].

CURRENT LAW: ENFORCEMENT & EFFECTIVENESS

In the United States, the Digital Millennium Copyright Act (DMCA) is the principal federal law pertaining to copyright infringement on the Internet. Passed in 1998, the DMCA requires ISPs, hosting companies, and websites like YouTube that post user-generated content to remove copyright-infringing material in response to complaints (DMCA takedown notices) from intellectual property owners. The DMCA also prohibits circumvention of Digital Right Management (DRM) technologies, with some exceptions.

The DMCA implemented two World Intellectual Property Organization (WIPO) treaties⁴ addressing copyright infringement and protection. Analogous laws have been passed in other countries, but not all WIPO member states have ratified or implemented the treaties – and even among countries that have done so, specific laws and regulations vary widely. Since criminal cases involving online copyright infringement may involve people or companies located in one country, using servers located in another, and processing payments through third parties located anywhere, matters of jurisdiction, extradition and prosecution can be complicated to say the least.

Even when its regulations are followed to the letter, many consider the DMCA to be ineffective at best – and grossly inequitable at worst. According to adult industry attorney Chad Belville, the DMCA had good intentions but “in the real world, it makes enforcement of copyright more difficult by giving some cover and defense to operators that are intentionally infringing on the hard work of legitimate producers.”⁵

Written law also tends to lag behind new developments in technology. For instance, illegally reproducing or distributing copyrighted work is classified as a felony under U.S. law, but legal questions have arisen about whether streaming falls into this category. The Office of the U.S. Intellectual Property Enforcement Coordinator has asserted that this confusion impairs the enforcement of copyright laws and has recommended “that Congress clarify that infringement by streaming, or by means of other similar new technology, is a felony in appropriate circumstances.”⁶

Also impacting and complicating anti-piracy efforts are consumers’ attitudes towards piracy. A 2011 survey conducted within the United States indicated that “family and friends” sharing of movie/TV files is widely accepted as a reasonable activity. Although uploading such files to public websites had considerably less

⁴ The WIPO Copyright Treaty and the WIPO Performances and Phonograms Treaty

⁵ Yagielowicz, Stephen & Rhett Pardon. “DMCA: The Porn Industry’s Worst Nightmare.” *XBIZ* 18 July 2012.

⁶ Office of the U.S. Intellectual Property Enforcement Coordinator. “Administration’s White Paper on Intellectual Property Enforcement Legislative Recommendations.” March 2011.

support, 20% of poll respondents between 18 and 29 felt that this too was reasonable.⁷ It may be more revealing to observe how people vote with their clicks: before it was shuttered in a highly-publicized bust, file hosting service Megaupload reputedly had 50 million daily visitors, representing 4% of all Internet traffic.

⁷ Karganis, “Copyright Infringement...” *op. cit.*

THE IMPACT OF PIRACY ON THE ADULT ENTERTAINMENT INDUSTRY

The advent of YouTube in 2005 created a new distribution channel, one that was global and extremely scalable, and so both cost efficient and effective. The adult industry quickly adopted the model, greatly reducing distribution costs and lowering barriers to entry. The subsequent influx of competition led to a huge expansion in the provision of free content. That in turn drove subscription rates down to a point where they were often abandoned altogether and companies instead turned to advertising revenue based on traffic, encouraging the provision of more free content. That led to the widespread theft of content in order to drive demand and the perverse situation where content producers were earning less from their creations than pirates were.

In an informal survey by IFFOR of several adult sites, two thirds of site owners said tubes, torrents and file-lockers have had an extremely negative impact on their businesses. At the same time, they acknowledged that increased competition accounted for some of the lost revenues. The other third surveyed, comprising of sites established following the adoption of the YouTube model, reported a positive impact on their business; this group has largely embraced content partner programs. Despite partner programs providing a profitable route, tubes sites, torrent and file-locker sites continue to outnumber content partner programs.

More than half of adult sites polled experienced a peak in revenue between 2006 and 2009. Decline from the peak ranged from 31% to 83%. All sites surveyed continue to fight copyright and trademark infringement, spending anywhere from \$350 to \$3,800 per month.

Piracy, and to a lesser extent the provision of free content, has had a significant impact on the adult entertainment industry economically, and necessitated a shift in business models. Established players have moved into content that is more difficult or impossible to pirate such as live content.

It is difficult to pinpoint the degree of revenue decline directly attributable to piracy (as opposed to competition or other factors) but the impact of piracy has been significant, permanent, and forced the industry to adapt and innovate in order to maintain profitability.

THE INDUSTRY RESPONDS

Entertainment companies have been fighting piracy by both technical and legal means. Content identification technologies such as digital watermarking (which involves adding unique identifying information to existing content) and digital fingerprinting (which derives such identifiers by analyzing content without altering it) are commonly used to enable searches for copyright-infringing content. In both methods, identifiers from suspect content are compared with “reference” watermarks or fingerprints stored in a database.⁸

Once infringement is detected, a DMCA takedown notice can be issued to the site hosting the pirated content (see “Current Law: Enforcement & Effectiveness,” above) as well as to search engines providing links to it. The anti-piracy service “Takedown Piracy” has become one of Google’s top reporters of copyright infringements, accounting for reports of thousands of infringing domains and millions of URLs per month; the service’s owner calls Google “extremely compliant and timely in removing links leading to pirated content.”⁹ However, in cases where takedown notices fail to result in swift action (as when pirates ignore notices or simply shuffle links, user accounts and other information) or where infringement is massive or habitual (as with some BitTorrent and “tube” sites), some companies have also resorted to litigation:

Being clubbed so hard by piracy, adult companies are fighting back with litigation, bundling defendants in large numbers, and going directly after tube site owners and file-sharing locker operators with multimillion-dollar suits. Adult companies Corbin Fisher, VCX Inc., Grooby Productions, Titan Media, Lightspeed Media, BlazingBucks, Elegant Angel, West Coast Productions and Axel Braun Productions have been the most prolific in filing porn BitTorrent claims. And Private Media Group and Pink Visual have taken the strongest legal approaches against tube sites posting content online illegally. (Rhett Pardon. “Poll: Adult Industry Split Over Content Piracy Action.” *XBIZ* 11 May 2011.)

Pink Visual has successfully used litigation to pressure some tube sites to commit to implementing digital fingerprint filtering to prevent copyright infringement.¹⁰ Lawsuits against large numbers of unnamed defendants allegedly involved in file-sharing have been less successful, however, according to veteran IP attorney Greg Piccionelli. He finds that such mass copyright enforcement procedures fall short as both deterrents and revenue generators.¹¹

⁸ Mediahedge. “Digital Fingerprinting.” 2010.

⁹ “Takedown Piracy is #1 Google Copyright Infringement Reporter.” *AVN* 18 July 2012.

¹⁰ Pardon, Rhett. “Pink Visual Enters Into Consent Judgment With Tube Site Operator.” *XBIZ* 14 Jan. 2012.

¹¹ Piccionelli, Gregory A. “Bittorrent Legal Mania.” *XBIZ* 10 Mar. 2011.

Aiming to stifle the financial incentive for piracy via direct action, grassroots efforts such as the “Stop File Lockers” campaign have managed to convince some payment processors (including Paypal) to discontinue relationships with file lockers engaged in piracy.¹² Internet billing service CCBill announced in June 2012 that it had discontinued processing for all file locker websites.¹³ Stop File Lockers’ Robert King has also pressured file lockers to discontinue pay-per-download policies that encourage uploading of pirated content.¹⁴

¹² enigmax. “One Man Army On a Mission To Destroy The Cyberlocker Market.” *TorrentFreak* 5 July 2012. Retrieved 16 July 2012.

¹³ Gary Jackson. “A Message From CCBill.” *gfy.com* 14 June 2012. Retrieved 16 July 2012.

¹⁴ Hymes, Tom. “Interview with Robert King, aka AdultKing.” *AVN* 12 July 2012.

RECOMMENDATIONS

IFFOR recommends taking the following measures to combat piracy of your online content:

1) Register the copyright for your content.

Although in the United States you automatically own the copyright for your content from the moment it is created, formal copyright registration offers a number of advantages. For works originating in the United States, registration is necessary before legal action can be taken in the case of infringement – and can enable you to collect both statutory damages and attorney’s fees from an infringing party.¹⁵ Since proving “actual” damages and a pirate’s profits is a complicated and expensive undertaking, registration can thus ultimately make or break a content producer’s capacity to enforce their rights.¹⁶ (Non-U.S. content owners may register with the U.S. Copyright Office provided their country has a copyright treaty with the U.S.)

2) Watermark or fingerprint your content.

As previously noted (see “The Industry Responds,” above) content identification technologies like digital watermarking and fingerprinting can improve your technical ability to police and enforce your rights by helping you to track and prove copyright infringement. In addition, visibly watermarking content with your logo not only promotes brand awareness but also publicly reinforces ownership.

3) Engage the services of a DMCA agent or company.

DMCA services use the latest tools and techniques to scour the Internet for infringing content, generate notices in the proper format and transmit them to the appropriate parties. For many small and medium-sized studios, generating DMCA takedown notices in-house can be a distraction and a drain on resources. Outsourcing this task can enable you to devote your time and energy to running your business rather than chasing after pirates yourself.

4) Report abuse to search engines.

Search engines are responsive to reports of illegal content. For example, Google now processes copyright removal notices for upwards of 5 million URLs every

¹⁵ U.S. Copyright Office. *Copyright*. Washington: Government Printing Office, 2012.

¹⁶ Piccionelli, Gregory A. “5-Point Checklist for Content Producers.” *XBIZ* 10 Apr. 2012.

month, but has actually updated its search algorithms to take into account whether a particular website receives a high number of removal notices. Frequently offending sites may then be ranked lower in Google search results.¹⁷

5) Report abuse to payment processors.

The most effective way to stop piracy is to eliminate the profit motive, and a key intervention point is online payment processing. While the federal judiciary has found that credit card companies and other payment processors are not liable for what is called secondary or contributory copyright infringement (knowingly enabling piracy), these companies do not condone infringement upon intellectual property rights, and have policies in place to deter piracy.

In June 2011, several major credit card companies and payment processors agreed to develop “voluntary best practices to withdraw payment services for sites selling counterfeit and pirated goods.”¹⁸ These practices include standardized steps for validating ownership and infringement of intellectual property, cooperating with rights holders and industry associations, and reporting results to rights holders. Effective July 1, 2011, Visa Europe introduced a Global Brand Protection Programme requiring its members to screen and monitor merchants for illegal activity including violation of intellectual property rights.¹⁹ MasterCard’s Business Risk Assessment and Mitigation program similarly prohibits IP violations.²⁰

After analogous strategies were implemented by credit card and payment processing companies working with the Financial Coalition Against Child Pornography, there was a 50% drop in the number of commercial child pornography websites reported to the U.S. CyberTipline.²¹ The International AntiCounterfeiting Coalition too has been working with financial institutions to target websites selling counterfeit goods online.²² By taking advantage of the increasing number of reporting avenues, you can help educate financial institutions about piracy while making it harder for pirates to turn a profit. (See “Appendix 2: Mastercard & Visa Reporting Procedures,” below.)

¹⁷ Amit Singhal. “An update to our search algorithms.” *Inside Search: The official Google Search blog* 10 August 2012. Retrieved 14 August 2012.

¹⁸ Office of the U.S. Intellectual Property Enforcement Coordinator. “2012 U.S. Intellectual Property Enforcement Coordinator Joint Strategic Plan.” June 2012.

¹⁹ Visa Europe. “Global Brand Protection Programme.” *Visa Europe Member Letter VE 32/11*. 22 June 2011.

²⁰ MasterCard. “New Additions to the Business Risk Assessment and Mitigation Program.” *Global Security Bulletin No. 2*. 15 February 2012.

²¹ National Center for Missing & Exploited Children. *FCACP Background*. June 2012.

²² International AntiCounterfeiting Coalition. (September 27, 2011). *Iacc Has New Tools to Cut Off Money to Bad Sites* [Press release].

6) *Take legal action.*

(NOTE: Neither this section nor any other part of this document should be construed as legal advice.)

If you have taken all the steps above, but still find your content freely available, you may decide to take legal action. Note however that this will require a significant amount of groundwork and a long-term commitment with an uncertain outcome. Copyright enforcement in the United States happens in federal courts where many cases take three years or more to complete; it is best to view such a step as a long-term investment that will improve the bottom line in years to come. Aggressive copyright enforcement reduces the unauthorized display of your content and may make your brand more valuable.

Before taking legal action, develop a comprehensive copyright protection and enforcement plan. Outline your goals, the steps your company will take, and the time, effort and money you are willing to expend. Think of your business like a brick and mortar store: you want to prosecute offenders, but perhaps not every thief who grabs a piece of gum. Spend the “right” amount of money on protective measures that reduce theft without driving customers away or eating profit margins. A producer with high-end and high-cost content may determine 5% of their production budget should be allocated to protection measures, while a low-cost producer may look at a half percent of production costs as the “right” amount. A balanced plan includes security measures, enforcement measures, and does not make buying your product too difficult.

If you do choose to make legal enforcement part of your comprehensive plan, be sure to discuss this with a lawyer who understands your business and specializes in copyright enforcement.

APPENDIX 1: ORGANIZATIONS, LINKS & RESOURCES

United States Copyright Office

<http://www.copyright.gov/>

Anti-Piracy services

(Listing does not imply IFFOR endorsement)

DMCA Force

<http://www.dmcaforce.com/>

MediaAbuse

<http://mediaabusellc.com/>

Porn Guardian

<http://pornguardian.com/>

Remove Your Content

<http://removeyourcontent.com/>

Takedown Piracy

<http://takedownpiracy.com/>

Trade Organizations & Grassroots Campaigns

Adult Content Industry United Foundation

<http://www.aciuf.org/>

Free Speech Coalition Anti-Piracy Action Program

<http://fscapap.com/>

Stop File Lockers

<http://stopfilelockers.com/>

Anti-Piracy Groups around the world

Australian Federation Against Copyright Theft

www.afact.org.au

Anti-Piracy Organization for the Film and Video Industry (Austria)

www.vap.cc

Belgian Anti-piracy Federation

www.anti-piracy.be

Association for the Protection of Movies and Music (Brazil)

www.apcm.org.br

Danish Anti-Piracy Group

www.antipirat.dk

Association for the Fight Against Audiovisual Piracy (France)
www.alpa.asso.fr

Society for the Prosecution of Copyright Infringement (Germany)
www.gvu.de

International Federation Against Copyright Theft – Greater China
www.ifact-gc.org

Irish National Federation Against Copyright Theft
www.infact.ie

Anti-Piracy Federation for the Audio Visual Industry(Italy)
www.fapav.it

Japan & International Motion Picture Copyright Association
www.jimca.co.jp

Malaysian Federation Against Copyright Theft
www.mfact.org

Mexican Association for the Protection of Movies and Music
www.apcm.org.mx

Foundation for the Protection of Copyright for the Entertainment Industry
(Netherlands)
www.anti-piracy.nl

New Zealand Federation Against Copyright Theft
www.nzfact.co.nz

Foundation of Audiovisual Works Protection (Poland)
www.fota.net.pl

Russian Anti-Piracy Organization
www.no-piracy.ru

Southern African Federation Against Copyright Theft
www.safact.co.za

Anti-Piracy Federation (Spain)
www.fap.org.es

Swedish Antipiracy Bureau
www.antipiratbyran.se

Swiss Anti-Piracy Association
www.safe.ch

Taiwan Foundation Against Copyright Theft
www.tfact.org.tw

Ukrainian Anti-Piracy Organization
www.apo.kiev.ua

The Federation Against Copyright Theft (UK)
www.fact-uk.org.uk

Reporting Abuse

Removing Content from Google
<http://support.google.com/bin/static.py?hl=en&ts=1114905&page=ts.cs>

MasterCard Anti-Piracy Policy

http://www.mastercard.com/us/wce/PDF/MasterCard_Anti-Piracy_Policy.pdf

Reporting abuse about .XXX domains

<http://policy.search.xxx/dmca/>

VISA: How to Report IP Abuse

http://corporate.visa.com/about-visa/security-and-trust/intellectual-property-rights.shtml?ep=v_sym_ReportBrandAbuse

PayPal Acceptable Use Policy

https://cms.paypal.com/sg/cgi-bin/?cmd=_render-content&content_ID=ua/AcceptableUse_full

APPENDIX 2: MASTERCARD & VISA REPORTING PROCEDURES

REPORTING IP VIOLATIONS TO MASTERCARD:

When there is no law enforcement involvement, an intellectual property right holder may notify MasterCard of its belief that the online sale of a product(s) violates its intellectual property rights and request that MasterCard take action upon such belief. MasterCard maintains the following email address for this purpose: ipinquiries@mastercard.com.

The notification and request (the “Request”) must include:

- (a) a description of the alleged infringement, including the specific identity of the site allegedly engaged in the sale of the alleged Illegitimate Product and compelling evidence substantiating the allegation. The notification must specifically identify any products alleged to be an Illegitimate Product and the location of the alleged Illegitimate Product(s) on the website;
- (b) evidence that the allegedly Illegitimate Products can be purchased using a MasterCard-branded payment card, for example, by providing a screenshot of the MasterCard logo appearing on the Merchant website. Test transactions are helpful, but not required to submit a complete notification;
- (c) a copy of the right holder’s cease and desist letter or Digital Millennium Copyright Act (DMCA) notice notifying the website operator or Merchant that it is engaging in infringing activity, or an attestation that, to the best of the right holder’s knowledge, the site is not licensed or otherwise authorized to sell the alleged Illegitimate Products in question; and
- (d) evidence demonstrating that the right holder owns the copyright(s) or trademark(s) in question.

REPORTING IP VIOLATIONS TO VISA:

If you are an IP rights owner and believe a website is accepting Visa as a form of payment for products or services that infringe your IP rights, please provide the following information to us at Inquiries@visa.com:

Description of Violation

1. Please describe the Violation, including a description of the goods that are infringing, and attach all cease and desist letters, DMCA notices, or related

correspondence sent by the IP Owner notifying the Merchant of the infringing activity.

IP Owner's Contact Details

2. IP Owner Company Name
3. IP Owner Contact First & Last Name
4. IP Owner Contact Title
5. IP Owner Contact Email
6. List of IP Owner's Copyright or Trademark rights alleged to be infringed (include registration numbers and countries, if available)

If a law firm or association is acting on behalf of the IP Owner, please provide

- 7a. Agent Company Name
- 7b. Agent Contact First & Last Name
- 7c. Agent Contact Title
- 7d. Agent Contact Email
- 7e. Power of Attorney or authorization letter signed by IP Owner confirming Agent is authorized to act on behalf of IP Owner

Merchant Suspected of Engaging in Illegal Activity

8. Merchant Name
9. Merchant Website
10. Merchant Country (if available)

ABOUT IFFOR

The International Foundation for Online Responsibility (IFFOR) is a not-for-profit that builds pragmatic policies for Internet domain names. Effective policies for the registration and use of Internet addresses can bring huge benefit to Internet users, Internet registry operators as well as strengthen the Internet's infrastructure.

IFFOR has developed Baseline Policies aimed at establishing global standards for combating sexual child abuse images, providing effective parental control, ensuring accurate domain registration information, and protecting the privacy, security, and consumer rights of all Internet users.

IFFOR's Goals

- Promote user choice, parental control, and the development and adoption of responsible business practices designed to combat online child abuse images.
- Protect free expression rights as defined in the United Nations' Universal Declaration of Human Rights, Article 19.
- Protect the privacy, security, and consumer rights of consenting adult consumers.
- Foster communication among Internet stakeholders.

IFFOR has an independent Board, Policy Council and staff, as well as an Ombudsman that acts independently of all three. IFFOR policies are decided by a nine-person Policy Council (PC) with representatives from Child Advocacy, Free Expression, and Privacy and Security, and the Sponsored Community (adult entertainment); currently with representatives from the US, UK, Germany, Netherlands, and Australia. PC members have agreed to a pragmatic approach: self-regulation in a usable format while preserving the values of an open Internet. The PC actively seeks participation from the broader Internet community and makes decisions based on expert advice and the inclusion of affected parties.

More information about IFFOR may be found at www.iffor.org.